# UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

THE SIDING AND INSULATION CO.		Case No. 1:11-cv-01060
a/k/a THE ALUMINUM SIDING	(&	
INSULATION CO., INC., an Ohio		Judge Lesley Wells
corporation, individually and as the	ne )	•
representative of a class of similar	rly- )	
situated persons,	)	
Plai	ntiff, )	MOTION FOR ADMISSION PRO HAC VICE OF RYAN M. KELLY
v.	į (	
ALCO VENEDIO DIO	)	
ALCO VENDING, INC.,	)	
75.0	)	
Det	endant. )	

Pursuant to Local Rule 83.5(h), Plaintiff, The Siding and Insulation Co., by and through counsel, hereby moves this Honorable Court to admit Ryan M. Kelly *pro hac vice* to the United States District Court, Northern District of Ohio, for the purpose of prosecuting the above-captioned case. Mr. Kelly's contact information is as follows:

Ryan M. Kelly
Anderson + Wanca
3701 Algonquin Road, Suite 760
Rolling Meadows, IL 60008
Telephone: 847-368-1500
Fax: 847-368-1501

Email: rkelly@andersonwanca.com

Attached hereto and incorporated herein as if fully rewritten is the Verified Statement and Oath of Ryan M. Kelly.

WHEREFORE, Ryan M. Kelly is an attorney in good standing of good and sufficient experience to conduct himself with acumen in the United States District Court for the Northern

District of Ohio and Plaintiff, The Siding and Insulation Co., hereby moves for the admission of Ryan M. Kelly *pro hac vice*.

Respectfully submitted,

/s/ Scott D. Simpkins

Scott D. Simpkins (0066775) sdsimp@climacolaw.com

CLIMACO, WILCOX, PECA, TARANTINO &

GAROFOLI CO., L.P.A. 55 Public Square, Suite 1950

Cleveland, Ohio 44113

Telephone: (216) 621-8484 Facsimile: (216) 771-1632

Attorneys for Plaintiff

#### **CERTIFICATE OF SERVICE**

A copy of the foregoing was filed electronically this day of June, 2011. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

Parties may access this filing through the Court's system.

/s/ Scott D. Simpkins
One of the Attorneys for Plaintiff

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THE SIDING AND INSULATION CO.		)	Case No. 1:11-cv-01060
a/k/a THE ALUMINUM SIDING &		)	
INSULATION CO., INC., an Ohio		)	Judge Lesley Wells
corporation, individually and as the		)	-
representative of a class of	similarly-	)	
situated persons,		)	
		)	
	Plaintiff,	)	MOTION FOR ADMISSION PRO HAC VICE OF RYAN M. KELLY
v.		)	
		)	
ALCO VENDING, INC.,		)	
		)	
	Defendant.	)	

### <u>VERIFIED STATEMENT AND OATH OF RYAN M. KELLY</u> IN SUPPORT OF APPLICATION FOR *PRO HAC VICE* ADMISSION

- I, Ryan M. Kelly, under the authority of the rules governing admission to the United States District Court, Northern District of Ohio, Eastern Division, move this Court for permission to participate *pro hac vice* as counsel in the above-referenced case and would show the Court as follows:
- 1. I am a member of the firm of Anderson + Wanca, 3701 Algonquin Road, Suite 760, Rolling Meadows, IL 60008, Telephone 847-368-1500, Fax 847-368-1501, Email rkelly@andersonwanca.com.
- 2. The firm that I am a member of has been counsel for The Siding and Insulation Co. in the past and The Siding and Insulation Co., through my assistance, was able to secure the services of Scott D. Simpkins, who is a practicing attorney, member of the State Bar of Ohio, and admitted to practice before this Court. Mr. Simpkins's bar registration number is 0066775. The firm address is as follows: Climaco, Wilcox, Peca, Tarantino & Garofoli Co., L.P.A., 55 Public Square, Suite 1950, Cleveland, OH 44113.
- 3. I am licensed to practice in the states of Illinois, and I am an active member in good standing. I have also been admitted to practice before the United States District Courts in the Northern District of Illinois and the Eastern District of Wisconsin.
- 4. I have not been the subject of a disciplinary action in the last five years by the bar or courts of any jurisdiction in which I have been licensed.

- 5. I have not been denied admission to the courts of any state or to any federal court during the last five years.
- 6. This Verified statement is accompanying a motion of Ohio attorney, Scott D. Simpkins, with whom I will be associated in the proceedings of this case, and below is an Oath per Local Rule 83.5(f).

WHEREFORE, Movant, Ryan M. Kelly, prays that this Court grant him permission to participate as a non-resident attorney in the proceedings of this case.

Ryan M. Kelly

#### **OATH**

Pursuant to Local Rule 83.5(f):

I, Ryan M. Kelly, do solemnly swear that as an attorney of this Court, I will conduct myself uprightly, according to the law and the ethical standards of the Code of Professional Responsibility adopted by the Supreme Court of Ohio, so far as they are not inconsistent with Federal Law, and that I will support the Constitution and laws of the United States.

Rvan M. Kellv

SWORN and SUBSCRIBED to before me this 31<sup>st</sup> day of May, 2011.

Tinat. Natale Notary Public OFFICIAL SEAL TINA L. NATALI NOTARY PUBLIC, STATE OF ILLINOIS My Commission Expires 11/15/2011